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*Attorneys for Certain Underwriters*

*at Lloyd's, London subscribing to Policy*

*No. PIV141351 and HDI Global Specialty SE*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

MDH GLOBAL, LLC

Plaintiff,

v.

CERTAIN UNDERWRITERS AT  
LLOYD'S, LONDON,  
UNDERWRITERS AT LLOYD'S  
LONDON KNOWN AS SYNDICATE  
XLC 2003, CNP 4444, NVA 2007, ARG  
2121, and ASC 1414, and HDI GLOBAL  
SPECIALTY SE,

Defendants.

CIVIL ACTION NO. 3:20-cv-08214-BRM-ZNQ

**NOTICE OF MOTION TO  
TRANSFER VENUE**

*Document Filed Electronically*

**TO:** Ryan M. Farrell, Esq.  
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**PLEASE TAKE NOTICE** that on **Monday, November 2 at 9:00 a.m.** or as soon thereafter as counsel may be heard, the undersigned attorneys for Defendants, Certain Underwriters at Lloyd's, London subscribing to Policy No. PIV141351 and HDI Global Specialty SE, shall move before the United States District Court for the District of New Jersey, at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for an Order pursuant to 28 U.S.C. §1404(a) to transfer this action to the United States District Court for the Eastern District of North Carolina.

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, Defendants shall rely upon the supporting Brief and Declaration of David J. D'Aloia submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

Dated: October 7, 2020  
Florham Park, New Jersey

**SAIBER LLC**

By: /s/ David J. D'Aloia  
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No. PIV141351 and HDI Global Specialty SE*

**CERTIFICATION OF SERVICE**

On October 7, 2020, I caused the within Notice of Motion, Defendants' Brief, the Declaration of David J. D'Aloia and Proposed Order to be filed via ECF.

On October 7, 2020, I caused the within Notice of Motion, Defendants' Brief, the Declaration of David J. D'Aloia and Proposed Order to be served on all counsel below via ECF and e-mail:

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